

Summary of Recommended Deductions

MARK BUTTITA

In re Motors Liquidation Co., et al. : Review of the Final Fee Applications

Total Fees & Expenses Requested		\$187,245.79
Total Fees Requested		\$173,272.50
Total Expenses Requested		\$13,973.29
Analysis		
Fee Category	Recommended Disallowance	
Exhibit A: Time Increments		\$24,548.75
Exhibit B: Travel Time		\$4,160.00
Exhibit C: Vague Task Descriptions		\$938.40
Exhibit D: Block Billing		\$8,380.95
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Total Reductions		\$38,028.10
[1/3 Rate Discount]		(\$12,676.03)
Fees and Expenses Total Recommended Disallowance		\$25,352.07

EXHIBIT A

(Time Increments)

Exhibit A: Time Increments

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
1	6/4/2009	Tobin, Rita C.	\$530.00	1.00	\$530.00	Review briefs filed in Chrysler appeal re possible GM issues (1.0)	\$530.00
2	6/5/2009	Tobin, Rita C.	\$530.00	1.00	\$530.00	Review Committee documents/filings as circulated (1.0)	\$530.00
3	6/8/2009	Tobin, Rita C.	\$530.00	1.00	\$530.00	Review filings and GM documents/conference RER re GM (1.0)	\$530.00
4	6/9/2009	Tobin, Rita C.	\$530.00	1.00	\$530.00	Review Committee materials as circulated by Kramer (1.0)	\$530.00
5	6/9/2009	Reinsel, Ronald E.	\$640.00	2.50	\$1,600.00	Dinner meeting w/Committee counsel and members.	\$1,600.00
6	6/11/2009	Benetos, Eugenia	\$205.00	2.00	\$410.00	Perform review of daily docket for group. T/C with court clerk: re: amended notice and filing protocol. T/C and meeting with RCT re: drafts. QC all drafts before emailing to RCT. (2)	\$410.00
7	6/12/2009	Benetos, Eugenia	\$205.00	1.00	\$205.00	(Late entry for June 12, 2009). Perform review of docket and print all objections filed for RCT. Print daily docket for RCT. (1)	\$205.00
8	6/12/2009	Benetos, Eugenia	\$205.00	1.50	\$307.50	Filing and service of Amended Notice of Appearance. Filing of Motion. QC of all documents. (1.5)	\$307.50

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
9	6/15/2009	Tobin, Rita C.	\$530.00	1.00	\$530.00	Review memos to Committee from Committee counsel; review docket (1.0)	\$530.00
10	6/15/2009	Benetos, Eugenia	\$205.00	2.50	\$512.50	Perform review of docket and create daily docket report for RER, RCT, KCM, JPW. (2); and draft affidavit fro PHV motion. Update service list and file electronically. (.5)	\$512.50
11	6/16/2009	Benetos, Eugenia	\$205.00	2.00	\$410.00	Perform review of daily docket. Convert to PDFs and distribute daily docket to RER, RCT, KCM, and JPW. (2)	\$410.00
12	6/17/2009	Benetos, Eugenia	\$205.00	1.00	\$205.00	Perform review of daily docket. Convert to PDFs and distribute daily docket to RER, RCT, KCM, and JPW. (1)	\$205.00
13	6/18/2009	Benetos, Eugenia	\$205.00	1.00	\$205.00	Perform review of daily docket. Convert to PDFs and distribute daily docket to RER, RCT, KCM, and JPW. (1)	\$205.00
14	6/19/2009	Benetos, Eugenia	\$205.00	1.00	\$205.00	Perform review of daily docket. Convert to PDFs and distribute daily docket to RER, RCT, KCM, and JPW. (1)	\$205.00

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
15	6/22/2009	Tobin, Rita C.	\$530.00	1.00	\$530.00	Review objections (Esserman, Cooney, Product Liability) (1.0); conference EI re status (.1); review Committee circulated documents; Agenda, Issues (meeting with Debtors), By-laws (.6)	\$530.00
16	6/22/2009	Inselbuch, Elihu	\$920.00	0.50	\$460.00	Conf. RCT and read papers.	\$460.00
17	6/23/2009	Tobin, Rita C.	\$530.00	2.00	\$1,060.00	Review proposed Committee objection (.5); TC TWS re discovery (.2); conference EB re discovery: service (.3); respond to GM service/discovery issues (1.0); review discovery requests, other parties (.5)	\$1,060.00
18	6/23/2009	Swett, Trevor W.	\$660.00	4.00	\$2,640.00	Conference with RER re discovery; telephone conferences with RCT and e-mails re discovery (.3); prepare discovery requests and notices (4.0)	\$2,640.00
19	6/23/2009	Benetos, Eugenia	\$205.00	1.00	\$205.00	Perform review of daily docket. Distribute to group. Research re: service list. (1)	\$205.00

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
20	6/23/2009	Benetos, Eugenia	\$205.00	1.50	\$307.50	Perform review of daily docket. Convert to PDFs and distribute daily docket to RER, RCT, KCM, and JPW. Perform review of docket re: service list and discovery. (1.5)	\$307.50
21	6/24/2009	Tobin, Rita C.	\$530.00	8.00	\$4,240.00	TCs TWS, conferences EB, numerous emails re discovery issues (1.0); discovery requests: service, TCs and emails TWS, RER, TC US Attorney (7.0)	\$4,240.00
22	6/24/2009	Benetos, Eugenia	\$205.00	8.50	\$1,742.50	Perform review of court docket. QC all documents re: discovery. Obtain signatures from EI. E-Service to parties re: discovery. Electronically file depositions and affidavits of service. Convert all Word documents to PDF documents. T/Cs with RCT re: filing protocol and meeting with RCT. Prepare materials for hand delivery and federal express. Emails to Creditor Committee and T/Cs with Court clerk and court chambers re: discovery. (8.5)	\$1,742.50

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
23	6/24/2009	Benetos, Eugenia	\$205.00	8.50	\$1,742.50	Perform QC of all documents to be e-filed, emailed and sent via overnight courier. E-file documents with Affidavit of Services. Convert all WORD documents to PDF documents. T/Cs with RCT re: discovery protocol on ECF. Meeting with RCT re: discovery. T/C with Judge's chambers. Perform review of docket re: CMO. (8.5)	\$1,742.50
24	6/25/2009	Benetos, Eugenia	\$205.00	3.50	\$717.50	Perform review of docket re: committees. Draft emails to counsel. Prepare service list. (3.5)	\$717.50
25	6/25/2009	Tobin, Rita C.	\$530.00	0.50	\$265.00	Draft signature page, TCs, emails RER, TWS (.3); draft and edit letter to UST (.8); emails re 30(b)(6) issues list, service, et al. (.2); review Committee memos and distributions (.5)	\$265.00
26	6/25/2009	Wehner, James P.	\$495.00	1.00	\$495.00	Emails re productions and discovery (1.0); telephone conference with RCT re discovery (0.4); telephone conference with P. Nowrangi re GM/UST production (0.2); and review GM/UST production (2.3)	\$495.00

Exhibit A: Time Increments

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
27	6/26/2009	Inselbuch, Elihu	\$920.00	0.50	\$460.00	T/c Cooney/RER.	\$460.00
28	6/26/2009	Benetos, Eugenia	\$205.00	5.00	\$1,025.00	Perform QC of Depositions. Electronically file and service through email and overnight courier. (5)	\$1,025.00
29	6/26/2009	Tobin, Rita C.	\$530.00	2.50	\$1,325.00	Review Committee memos, distributions (.5); emails and TCs re document production issues (Wehner, RER) (2.0)	\$1,325.00
30	6/26/2009	Reinsel, Ronald E.	\$640.00	2.00	\$1,280.00	Multiple telephconfs/correspondence with RCT re discovery issues (.5); prepare for and attend committee meeting; follow-up (1.3); teleconf EL/clients and follow-up (.8); work w/TWS and JW re document production (.5); teleconf Esserman/RCT re depositions and hearing issues; follow up (.6); coordinate re depositions (.5); prep. re depositions (3.2); respond on proposed order (.5); follow-up re document production (.7).	\$1,280.00

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
31	6/26/2009	Wehner, James P.	\$495.00	1.00	\$495.00	Search GM/UST documents; assemble hot documents (3.8); meeting with TWS and RER re hot documents (.3); emails re document review issues (1.0) ; review meeting with team members (.4) and meeting with RER re hot documents; and review 30(b)(6) Notice (.4)	\$495.00
32	6/28/2009	Tobin, Rita C.	\$530.00	2.50	\$1,325.00	Review emails RER and draft filing re fact evidence (1.5); review deposition summaries and updates, Raleigh and Henderson (1.0)	\$1,325.00
33	6/28/2009	Reinsel, Ronald E.	\$640.00	3.00	\$1,920.00	Review documents and preparation (3.0) Travel to NYC/en route review documents and depo prep (3.5) organize documents and exhibits and outline depo inquiry (4.2)	\$1,920.00
34	6/29/2009	Tobin, Rita C.	\$530.00	0.50	\$265.00	Review Committee distributions (.5)	\$265.00
35	6/29/2009	Wehner, James P.	\$495.00	0.50	\$247.50	E-mails re UST documents (.5) ; e-mails re hearing arguments (.8); meet with legal assistants re document issues (.6)	\$247.50
36	6/29/2009	Butts, Erroll G.	\$235.00	4.00	\$940.00	Located documents through Concordance for NY Office.	\$940.00

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
37	6/29/2009	Benetos, Eugenia	\$205.00	3.00	\$615.00	QC Witness List. Electronically file, email and send via overnight courier to service list; prepare binders for Sales Motion for RCT and RER. Coordinate with DCO re: exhibits listed. (3)	\$615.00
38	6/30/2009	Benetos, Eugenia	\$205.00	5.00	\$1,025.00	Filing of Objection with TOA and TOC. Emails to RCT re: filing. Completion of exhibit books for RER and RCT. Travel to SDNY re: hearing. (5)	\$1,025.00
39	6/30/2009	Tobin, Rita C.	\$530.00	2.00	\$1,060.00	Emails re TOC and TOA preparation and filing (Wehner, EB) (.5); draft Statement of Issues (1.5)	\$1,060.00
40	6/30/2009	Greene, Michael C.	\$235.00	2.00	\$470.00	Per EGB, burn requested copy set of Treasury production CDs.	\$470.00
41	6/30/2009	Greene, Michael C.	\$235.00	0.50	\$117.50	Per JPW, draft enclosure letter and prepare copy set of Treasury production CDs for overnight delivery to Peter D'Apice.	\$117.50
42	7/1/2009	Tobin, Rita C.	\$530.00	10.00	\$5,300.00	Attend GM sale hearing, conferences RER and S. Esserman (10.0); Committee conference call (.8); revise Statement of issues (.5)	\$5,300.00

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
43	7/1/2009	Greene, Michael C.	\$235.00	2.00	\$470.00	Per EGB, conduct Concordance database search for exhibits listed in the Amended Evidence and Witnless List provided by Debtors.	\$470.00
44	7/1/2009	Butts, Erroll G.	\$235.00	0.50	\$117.50	Review documents received from NR for GM Exhibit List.	\$117.50
45	7/1/2009	Benetos, Eugenia	\$205.00	2.00	\$410.00	Perform review of daily docket and create daily docket memo for RER, RCT, and KCM. Filing through the ECF system and service of Joint Statement. QC document. (2)	\$410.00
46	7/2/2009	Inselbuch, Elihu	\$920.00	0.50	\$460.00	Argument issues.	\$460.00
47	7/2/2009	Greene, Michael C.	\$235.00	1.50	\$352.50	Per EGB, continue EDGAR and Concordance database searches for exhibits listed in the Amended Evidence and Witness List provided by Debtors.	\$352.50
48	7/6/2009	Tobin, Rita C.	\$530.00	3.50	\$1,855.00	GM Committee call, interviews of potential Directors (2.5); review J. Gerber Opinion (1.0); emails RER re same (.2)	\$1,855.00
49	7/7/2009	Inselbuch, Elihu	\$920.00	2.00	\$1,840.00	Read corres. on cert. motion (.2); read opinion and order, etc. (2.0); memos re: schedule (.2).	\$1,840.00

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
50	7/7/2009	Tobin, Rita C.	\$530.00	2.00	\$1,060.00	TCs emails RER re filing (.5); review emails and draft/file Joinder (.5); review Ad Hoc Motion for Stay (.5); review Product Liability Motion for Stay (.5); review Order, Mayer emails (.3); review objections to stay motion (.6)	\$1,060.00
51	7/7/2009	Benetos, Eugenia	\$205.00	2.00	\$410.00	Filing of Joinder re: Appeal. Filing through ECF and service to Counsel. QC document. (1) Research opinions re: Supreme Court, email to KCM. (1)	\$410.00
52	7/8/2009	Benetos, Eugenia	\$205.00	6.50	\$1,332.50	Prepare filing of pleading through ECF and service to all counsel. QC document. Create and distribute mass email. (6.5)	\$1,332.50
53	7/10/2009	Reinsel, Ronald E.	\$640.00	2.50	\$1,600.00	Follow-up re appeal hearing and draft memo follow-up re mootness issues (2.5)	\$1,600.00
54	7/14/2009	Benetos, Eugenia	\$205.00	0.50	\$102.50	Perform review of daily docket for RER, KCM, and RCT. (.5)	\$102.50
55	7/15/2009	Benetos, Eugenia	\$205.00	0.50	\$102.50	Perform review of daily docket for RER, KCM, and RCT. (.5)	\$102.50
Total Reduction:							\$49,097.50
Reduction [50%]:							\$24,548.75

EXHIBIT B

(Travel Time)

Exhibit B: Travel Time

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
1	6/4/2009	Reinsel, Ronald E.	\$640.00	2.50	\$1,600.00	Follow up re: committee meeting and teleconfs. w/EI, RCT, J. Cooney re: same (1.4); return travel to DC (2.5) ; teleconfs. and review document re: committee and by-law and Chrysler briefs (3.4).	\$1,600.00
2	6/10/2009	Reinsel, Ronald E.	\$640.00	2.50	\$1,600.00	Prep. for and attend meeting w/debtor, committee meeting and follow up w/committee members, teleconfs. w/Cooney, EI re: confidentiality issues and meeting (8.0); return travel to DC (2.5)	\$1,600.00
3	6/25/2009	Reinsel, Ronald E.	\$640.00	2.50	\$1,600.00	Correspondence and prep. for hearing/attend hearing; follow-up w/client and various counsel (5.3); return travel to DC/en route review documents re sale (2.5) ; multiple teleconfs/correspondence re discovery issues/depositions (2.7).	\$1,600.00
4	7/2/2009	Reinsel, Ronald E.	\$640.00	5.50	\$3,520.00	Prep for and appear at sale hearing (7.2), follow-up teleconf and memoranda (1.5), return travel to DC including flight delay (5.5)	\$3,520.00
Total Reduction:							\$8,320.00
Reduction [50%]:							\$4,160.00

EXHIBIT C

(Vague Task Descriptions)

Exhibit C: Vague Task Descriptions

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
1	6/20/2009	Inselbuch, Elihu	\$920.00	0.10	\$92.00	Status inquiry.	\$92.00
2	6/26/2009	Inselbuch, Elihu	\$920.00	0.50	\$460.00	T/c Cooney/RER.	\$460.00
3	6/30/2009	Inselbuch, Elihu	\$920.00	0.10	\$92.00	Amended Joinder.	\$92.00
4	7/2/2009	Inselbuch, Elihu	\$920.00	0.50	\$460.00	Argument issues.	\$460.00
5	7/7/2009	Inselbuch, Elihu	\$920.00	2.20	\$2,024.00	Read corres. on cert. motion (.2); read opinion and order, etc. (2.0); memos re: schedule (.2).	\$2,024.00
Total Reduction:							\$3,128.00
Reduction [30%]:							\$938.40

EXHIBIT D

(Block Billing)

Exhibit D: Block Billing

MARK BUTTITA

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
1	6/15/2009	Reinsel, Ronald E.	\$640.00	2.90	\$1,856.00	Review committee memoranda pleadings and analysis; follow up teleconf. re: same.	\$1,856.00
2	6/15/2009	Reinsel, Ronald E.	\$640.00	2.80	\$1,792.00	Meet w/EI re: case issues and strategy prep. re: meeting w/client.	\$1,792.00
3	6/16/2009	Reinsel, Ronald E.	\$640.00	2.40	\$1,536.00	Review pleadings and correspondence, teleconfs. w/EI and team; review draft by-laws and memos.	\$1,536.00
4	6/18/2009	Reinsel, Ronald E.	\$640.00	9.50	\$6,080.00	Work re: drafting sale objection review/edit Esserman draft and research re: objection (9.5); follow up teleconfs re: Durbin inquiry (.50); teleconf and review re: B. Blessler and Esserman (.60); revise committee memo (1.2).	\$6,080.00
5	6/21/2009	Reinsel, Ronald E.	\$640.00	3.40	\$2,176.00	Review docket and filed sale objection.	\$2,176.00
6	6/22/2009	Benetos, Eugenia	\$205.00	1.50	\$307.50	Perform review of daily docket. Convert to PDFs and distribute daily docket to RER, RCT, KCM, and JPW and perform review of docket re: debtor's response for RCT (1.5)	\$307.50

Exhibit D: Block Billing

MARK BUTTITA

In re Motors Liquidation Co., et al. : Review of the Final Fee Applications

Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
7	6/24/2009	Benetos, Eugenia	\$205.00	8.50	\$1,742.50	Perform review of court docket. QC all documents re: discovery. Obtain signatures from EI. E-Service to parties re: discovery. Electronically file depositions and affidavits of service. Convert all Word documents to PDF documents. T/Cs with RCT re: filing protocol and meeting with RCT. Prepare materials for hand delivery and federal express. Emails to Creditor Committee and T/Cs with Court clerk and court chambers re: discovery. (8.5)	\$1,742.50
8	6/24/2009	Benetos, Eugenia	\$205.00	8.50	\$1,742.50	Perform QC of all documents to be e-filed, emailed and sent via overnight courier. E-file documents with Affidavit of Services. Convert all WORD documents to PDF documents. T/Cs with RCT re: discovery protocol on ECF. Meeting with RCT re: discovery. T/C with Judge's chambers. Perform review of docket re: CMO. (8.5)	\$1,742.50
9	6/25/2009	Benetos, Eugenia	\$205.00	3.50	\$717.50	Perform review of docket re: committees. Draft emails to counsel. Prepare service list. (3.5)	\$717.50

Exhibit D: Block Billing

MARK BUTTITA

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
10	6/26/2009	Swett, Trevor W.	\$660.00	1.60	\$1,056.00	GM discovery: draft Rule 30(b)(6) subparts; conference with JPW regarding document review; conference with RER regarding client's instructions.	\$1,056.00
11	6/26/2009	Benetos, Eugenia	\$205.00	5.00	\$1,025.00	Perform QC of Depositions. Electronically file and service through email and overnight courier. (5)	\$1,025.00
12	6/27/2009	Sackett, Andrew J.	\$295.00	7.70	\$2,271.50	Review of documents provided by debtor; legal research regarding future claims; meeting with JPW, KCM, and RER regarding document review and legal research.	\$2,271.50
13	6/29/2009	Greene, Michael C.	\$235.00	5.50	\$1,292.50	Per EGB, conduct Concordance database search for exhibits listed in the Amended Evidence and Witness List provided by Debtors in advance of June 30, 2009 hearing on Debtors' Asset Sale Motion.	\$1,292.50
14	6/30/2009	Benetos, Eugenia	\$205.00	5.00	\$1,025.00	Filing of Objection with TOA and TOC. Emails to RCT re: filing. Completion of exhibit books for RER and RCT. Travel to SDNY re: hearing. (5)	\$1,025.00

Exhibit D: Block Billing

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Row No.	Date	Timekeeper	Rate	Hours	Fees	Description	Reduction
15	7/6/2009	Reinsel, Ronald E.	\$640.00	3.10	\$1,984.00	Review documents and prep for committee call and participate in committee call re board candidates (3.1); Multiple teleconfs and follow-up re sale decision and potential appeal issues, draft memo re same and follow up re sale hearing (3.9); Participate in continued committee call (0.8)	\$1,984.00
16	7/8/2009	Benetos, Eugenia	\$205.00	6.50	\$1,332.50	Prepare filing of pleading through ECF and service to all counsel. QC document. Create and distribute mass email. (6.5)	\$1,332.50
Total Reduction:							\$27,936.50
Reduction [30%]:							\$8,380.95